

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**Re: ECF Nos. 24157, 24154,
24103, 23621, 23612, and 21326.**

This filing relates only to HTA

**MOTION SUBMITTING CERTIFIED TRANSLATION IN CONNECTION WITH THE
PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY'S
(1) OPPOSITION TO (A) MOTION REQUESTING PAYMENT OF SEVERANCE
DAMAGES [ECF NO. 23612], AND (B) AMENDED PETITION REQUESTING
PAYMENT OF SEVERANCE DAMAGES [ECF NO. 24103], AND (2) REPLY TO
RESPONSE FILED BY CLAIMANT ADRIÁN MERCADO JIMÉNEZ [ECF NO. 21326]
IN CONNECTION WITH THE FOUR HUNDRED FIFTY-FOURTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) TO SATISFIED CLAIMS**

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Highways and Transportation Authority ("HTA"), by and through the
Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as sole

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

representative of HTA pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)², hereby respectfully states as follows:

1. On May 5, 2023, HTA filed *The Puerto Rico Highways and Transportation Authority’s (1) Opposition to (A) Motion Requesting Payment of Severance Damages [ECF No. 23612], and (B) Amended Petition Requesting Payment of Severance Damages [ECF No. 24103], and (2) Reply to Response Filed by Claimant Adrian Mercado Jiménez [ECF No. 21326] in Connection with the Four Hundred Fifty-Fourth Omnibus Objection (Non-Substantive) to Satisfied Claims [ECF No. 24153]* (the “Objection”). In support of the arguments in the Objection, HTA attached as Exhibit 2 thereto the Judgment dated May 31, 2019, issued by the Commonwealth Court of Appeals in connection with Case K EF2011-0240, in its original Spanish language (the “Judgment”).

2. On that same day, HTA filed a motion requesting leave to file the Judgment in the Spanish language and three business days, until May 10, 2023, to provide the Court with a certified translation of the Judgment. *See* [ECF No. 24154].

3. On May 8, 2023, the Court entered an order granting HTA until May 10, 2023 to file a certified translations of the Judgment to the English language. *See* [ECF No. 24157].

4. Attached hereto as **Exhibit A** is a certified translation to the English language of the Judgment.

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² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

WHEREFORE, HTA respectfully requests the Court take notice of the filing of this certified translation in compliance with the Court's orders.

Dated: May 10, 2023
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Hermann D. Bauer
Hermann D. Bauer